

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TYLER MILLER, an individual,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:18-cv-00562-SB
STEVE WATSON, an individual,)	
JEFFREY DICKERSON, an individual,)	
STEVE SALLE, an individual, JOHN)	
DOE DEFTS. 1-5, AKIN BLITZ, an)	
individual, and BULLARD LAW, P.C.,)	
an Oregon professional corporation,)	
)	
Defendants.)	
)	

DEPOSITION OF
CHANDRA MARIE EGAN
Taken in behalf of the Plaintiff

* * *

February 4, 2020
1000 SW Broadway, Suite 2000
Portland, Oregon

Ashley L. Aronson
Court Reporter

Chandra Egan

February 4, 2020

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1 APPEARANCES:

2 For the Plaintiff: MR. JOHN D. OSTRANDER
 Attorney at Law
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 Suite 1500
 4 Portland, Oregon 97205
 503-224-7112
 5 john@eoplaw.com

6 For the Defendant, MS. BETH PLASS
 Watson: Attorney at Law
 7 111 SW Columbia
 Suite 1100
 8 Portland, Oregon 97201
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10 For the Witness, MR. ANDREW WEINER
 Egan: Attorney at Law
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14 Also Present: (None)

15

16 INDEX

17 EXAMINATION BY	PAGE NO.
18 Mr. Ostrander	3 - 33

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20 EXHIBITS

21 No. 1 Text messages from 2015	9
22 No. 2 Text messages from 2016	14
23 No. 3 Facebook post	26

24

25

Chandra Egan

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1 PORTLAND, OREGON; TUESDAY, FEBRUARY 4, 2020

2 9:30 a.m.

3 * * *

4 CHANDRA MARIE EGAN

5 called as a witness in behalf of the Plaintiff,

6 having first been sworn by the Reporter,

7 testifies as follows:

8 EXAMINATION

9 BY MR. OSTRANDER:

10 Q. Please state your full name.

11 A. Chandra Marie Egan.

12 Q. Have you ever been deposed before?

13 A. No.

14 Q. You understand that I'm taking your
15 deposition this morning?

16 A. Yes.

17 Q. And you understand that you are under oath?

18 A. Yes.

19 Q. And that the court reporter is taking down
20 everything that is said today?

21 A. Yes.

22 Q. And do you understand that your testimony
23 today may be used for various purposes throughout this
24 lawsuit or at trial?

25 A. Yes.

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1 Q. (By Mr. Ostrander) You understand you're
2 still under oath?

3 A. Yes.

4 Q. So you saw Mr. Watson at this APCO
5 conference. Did you talk at that time?

6 A. We said hello.

7 Q. Anything else?

8 A. No.

9 Q. And you said you saw him perhaps one other
10 occasion. Do you recall that?

11 A. Yes.

12 Q. What was that?

13 A. We drove by each other and waved.

14 Q. Anything else?

15 A. No.

16 Q. Do you know Tyler Miller?

17 A. Yes.

18 Q. When did you first meet Mr. Miller?

19 A. I don't remember.

20 Q. Do you remember the circumstances of when you
21 first met him?

22 A. He was a reserve deputy and I was a
23 dispatcher.

24 Q. At any time did you consider Mr. Miller a
25 friend?

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1 A. No.

2 Q. Were you ever on friendly terms with him?

3 A. Yes.

4 Q. Are you still on friendly terms with him?

5 A. No.

6 Q. And why not?

7 A. I chose to start making my personal life and
8 my professional life separate.

9 Q. Is there anything that triggered the -- any
10 instance that triggered a termination of considering
11 Mr. Miller someone that you're on friendly terms with?

12 A. No.

13 Q. I'm going to hand you an exhibit.

14 MR. OSTRANDER: If you can mark this as
15 Exhibit 1 to this deposition.

16 (Deposition Exhibit No. 1 was marked for
17 identification.)

18 Q. (By Mr. Ostrander) What I'm handing you
19 marked as Exhibit 1 are four pages. At the bottom
20 right-hand corner it says, Egan subpoena 0011 through
21 0014. Can you identify what these are?

22 A. Text messages between Tyler Miller and I.

23 Q. Okay. And did you -- and it looks like the
24 ones that are copied here are in the 2015 time period.

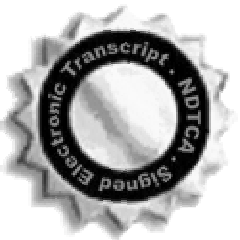
25 A. Yes.

C E R T I F I C A T E

STATE OF OREGON)
COUNTY OF MULTNOMAH)

I, Ashley L. Aronson, a Notary Public in and for the State of Oregon, certify that the deposition of CHANDRA MARIE EGAN occurred at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all the testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction and the foregoing transcript, pages 1 through 33, both inclusive, contains a full, true and correct record of all such testimony adduced and oral proceedings had and of the whole thereof.

Witness my hand and Notarial seal at
Portland, Oregon, this 18th day of February, 2020.



Ashley L. Aronson
ASHLEY L. ARONSON
Notary Public for the State of
Oregon, residing at Portland
Commission No. 979842
My Commission Expires: 10/1/2022